

EXHIBIT B

From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Tuesday, February 23, 2021 4:48 PM
To: Priselac, Jessica <JPriselac@duanemorris.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Hansen, Forrest <FRHansen@duanemorris.com>
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

Plaintiffs will be relying on the following documents in their agenda letter, which will be filed momentarily:

ZHP00072194
ZHP00120646
ZHP00120313
ZHP00120482
ZHP00063901
ZHP00122869
ZHP00122986
ZHP00122734
ZHP00125610
ZHP00126071
ZHP00137063
ZHP00063956
ZHP00137715
ZHP00139054
ZHP00141038
ZHP00146507.

We understand that you will not be able to assess whether these documents should remain confidential before Plaintiffs' opposition is filed. As a result, we will provide the documents to the Court for its in camera review.

Plaintiffs describe the above document in great detail in their agenda letter, and those descriptions are hereby incorporated into this email. In light of those descriptions, there is nothing about the documents that justifies treatment as confidential under the protective order, especially given the public health interests involved. Nevertheless, Plaintiffs are available to meet and confer regarding the confidentiality designations of these documents, as required before ZHP's motion to seal pursuant to the protective order.

Best,
Chris

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